

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

| | | |
|-----------------------------------|---|-----------------------------------|
| ADDISON INSURANCE COMPANY, |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| v. |) | Case No. 4:24-cv-00790-JMB |
| |) | |
| LOU BUDKE’S ARROW FINANCE |) | |
| COMPANY, et al., |) | |
| |) | |
| Defendants. |) | |

JOINT PROPOSED SCHEDULING PLAN

COME NOW Plaintiff Addison Insurance Company and Defendants Lou Budke’s Arrow Finance Company and Richard Kyles, each by and through their attorneys, and submit this Joint Proposed Scheduling Plan for the Court.

Pursuant to Rule 16(b) and 26(f) of the Federal Rules of Civil Procedure, the parties are ordered to comply with the following schedule and order.

1. The parties shall disclose information and exchange documents pursuant to Fed.R.Civ.P. 26(a)(1) by November 12, 2024.

2. Any motions to join additional parties shall be filed on or before January 3, 2025. Any motion to amend the pleadings or motions to dismiss shall be filed on or before January 3, 2025.

3. Plaintiff shall disclose its expert witness’ identities and reports by March 3, 2025 and make them available for deposition by April 11, 2025.

Defendants shall disclose their expert witness’ identities and reports by May 5, 2025 and make them available for deposition by June 13, 2025.

4. The presumptive limit of ten depositions per side as set forth in Fed.R.Civ.P. 30(a)(2)(A) and twenty-five interrogatories per party as set forth in Fed.R.Civ.P. 33(a) shall

apply in this case.

5. Discovery shall not be conducted in phases or limited to certain issues.

6. The parties do not anticipate any requests for physical or mental examination pursuant to Fed.R.Civ.P. 35.

7. The parties anticipate the need for a protective order governing the use and disclosure of documents adduced in discovery and shall submit a proposed order via joint motion.

8. All discovery shall be completed by July 31, 2025.

9. Dispositive motions shall be filed by August 29, 2025.

10. The case shall be referred to mediation by October 30, 2025.

11. The earliest date by which this case should reasonably expected to be ready for a jury trial is November 15, 2025. It is estimated the case can be tried to verdict in five days.

Respectfully submitted,

BROWN & RUPRECHT, PC

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CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2024, I electronically filed the above and foregoing with the clerk of the court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Diane Hastings Lewis

Attorney